

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAII

----- In the Matter of -----)
)
PUBLIC UTILITIES COMMISSION) DOCKET NO. 05-0002
)
Instituting a Proceeding to Investigate the)
Issues and Requirements Raised by, and)
Contained in, Hawaii Revised Statutes)
486H, as Amended)
_____)

**SHELL OIL COMPANY'S RESPONSE TO
NOTICE OF ADDITIONAL FILING REQUIREMENT REGARDING ETHANOL
ISSUED ON MARCH 29, 2006**

AND

CERTIFICATE OF SERVICE

FILED
2006 MAR 31 A 11:56
PUBLIC UTILITIES
COMMISSION

KOBAYASHI SUGITA & GODA

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**SHELL OIL COMPANY'S RESPONSE TO
NOTICE OF ADDITIONAL FILING REQUIREMENT REGARDING ETHANOL
ISSUED ON MARCH 29, 2006**

Shell Oil Company ("Shell"), by and through its attorneys Kobayashi, Sugita & Goda, hereby respectfully responds to this honorable Commission's Notice of Additional Filing Requirement regarding Ethanol that was issued to the parties herein on the afternoon of March 29, 2006 ("Additional Filing Requirement"). Shell's response herein to the Additional Filing Requirement is without prejudice to and shall not be deemed a waiver of any legal rights or privileges.

By way of the Additional Filing Requirement, this Commission has required that Shell file the information sought to be captured in Appendix 2 of the Recommendations to Modify Hawaii Revised Statutes Chapter 486H, Gasoline Price Cap Legislation, for the Ethanol Mandate, Hawaii Administrative Rules, Title 15, Chapter 35 prepared by ICF Consulting, LLC and issued by this Commission to the parties herein on March 23, 2006 ("ICF Report").

The terms of the Additional Filing Requirement also provide that "[t]o the extent that a Party is unable to complete the Appendix 2 chart for one or more transactions, that Party is required to file the information that it does have available and is required to supplement its filing as soon as the missing information becomes available." *See* Additional Filing Requirement.

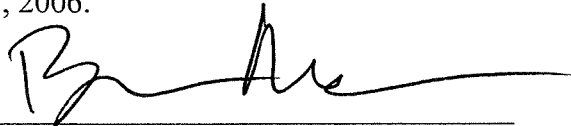
In the present case, given the timing of the Additional Filing Requirement and the requirement that Shell provide its response to it less than 48 hours after its issuance, Shell respectfully advises this Commission that it "is unable to complete the Appendix 2 chart

for” all of its ethanol transactions occurring in this state. *See Id.* Shell notes that the person in overseeing Shell’s ethanol purchasing for the State of Hawaii has been unavailable and will not return until the week of April 3, 2006.

As the Additional Filing Requirement further “require[s]” Shell “to file the information that it does have available[,]” Shell respectfully refers this Commission to Exhibit 1 attached hereto which is an incomplete chart showing what information Shell has available to report to the Commission in response to the Additional Filing Requirement as of noon on March 31, 2006. *See Id.*

Shell respectfully advises this Commission that it will promptly supplement Exhibit 1 with the information requested therein, once said information becomes available and is able to be transmitted to this Commission in the required format.

DATED: Honolulu, Hawaii, March 31, 2006.

A handwritten signature in black ink, appearing to read 'B. Higa', written over a horizontal line.

CLIFFORD K. HIGA
BRUCE NAKAMURA
KENNETH M. NAKASONE
Attorneys for SHELL OIL COMPANY

EXHIBIT 1

Ethanol Transaction Information

Information Requirements for Imported Ethanol Cargo and “Cargo-based” Resale Volumes of Ethanol:

Data	Imported Ethanol Cargo	Cargo-based Resale of Ethanol
Reporting Entity	Importer of Record	Buyer and Seller
Buyer Name	*	*
Seller Name	*	*
Volume (gallons)	*	*
Transaction Price, cpg	*	*
Other Fees (Harbor fees, etc), cpg	*	*
Cargo Delivery Vessel name	*	*
Transaction Location	*	*
Contract Date	*	*
Title Transfer Date	*	*
Import Source (Country or State)	*	

- * Requested data is currently being complied and will be transmitted to the Commission when it becomes available

CERTIFICATE OF SERVICE

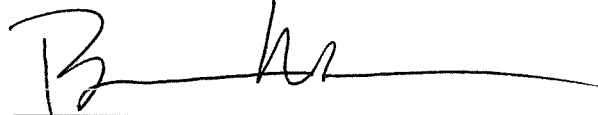
The undersigned hereby certifies that a true and correct copy of the above document was duly served upon the following parties in the manner described at their following last known addresses:

	<u>HAND- DELIVER</u>	<u>U.S. MAIL</u>
NICHOLE SHIMAMOTO, ESQ. Commission Counsel Hawaii Public Utilities Commission 465 S. King Street, Suite 103 Honolulu, HI 96813	X	
JON S. ITOMURA, ESQ. Division of Consumer Advocacy Dept. of Commerce and Consumer Affairs 335 Merchant Street, Rm. 326 Honolulu, Hawaii 96813 (2 copies)		X
MICHAEL H. LAU, ESQ. KENT D. MORIHARA, ESQ. Davies Pacific Center 841 Bishop Street, Suite 400 Honolulu, HI 96813 Attorneys for CHEVRON U.S.A. INC.		X
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MARKETERS ASSOCIATION

X

DATED: Honolulu, Hawaii, March 31, 2006.

A handwritten signature in black ink, appearing to be "B h", written over a horizontal line.

CLIFFORD K. HIGA
BRUCE NAKAMURA
KENNETH M. NAKASONE
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